

# Exhibit A

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ZHU ZHAI HOLDINGS LIMITED and  
PETER PUI TAK LEE

Plaintiff,

v.

STEVEN IVANKOVICH,

Defendant.

Case No. 1:20-cv-4985

Hon. Sharon Johnson Coleman

**DECLARATION OF WILLIAM R. SEARS**

Pursuant to 28 U.S.C. § 1746, I, William R. Sears, being duly sworn and under oath, declare as follows:

1. I am an attorney at law, duly admitted to practice before the Courts of the State of California, the Courts of the State of New York, the United States District Court for the Central District of California, and the United States District Court for the Northern District of California.
2. I am an Associate with the firm of Quinn Emanuel Urquhart & Sullivan, LLP, 865 South Figueroa Street, 10th Floor Los Angeles, CA 90017.
3. I am admitted to practice *pro hac vice* in the above-captioned matter. (Dkt. 9).
4. I am one of the attorneys of record for Plaintiffs Zhu Zhai Holdings Limited (“ZZH”) and Peter Pui Tak Lee (“Lee”) (collectively, “Plaintiffs”).
5. I submit this affidavit in support of Plaintiffs’ Request for Clerk’s Entry of Default Against Defendant Steven Ivankovich (“Request”), to which this declaration is attached as Exhibit A.

6. On August 24, 2020, Plaintiffs filed the complaint in this matter alleging breach of guaranty and fraudulent inducement against Defendant. (Dkt. 1).

7. On August 25, 2020, this Court issued a Summons for Ivankovich. (Minute entry).

8. On September 1, 2020, Plaintiffs' process server left copies of the summons and complaint at Defendant's dwelling or usual place of abode with Jeanette Ivankovich, Defendant's wife. Jeannette Ivankovich verbally confirmed to the process server that both she and Defendant Ivankovich resided at the address.

9. Also on September 1, 2020, Plaintiffs mailed a copy of the summons and complain by first-class mail to the same address.

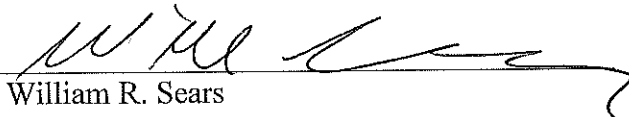
10. Plaintiffs filed a proof of service on September 15, 2020. (Dkt. 10).

11. As of the filing of Plaintiffs' Request, Defendant Steven Ivankovich has failed to answer or otherwise plead in this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a).

12. Quinn Emanuel has investigated the activities of Ivankovich, and employed the services of an investigation firm, First Legal Investigations. Therefore, I am informed and believe that Ivankovich is not an infant, incompetent, or an active-duty member of the United States military.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this the 2nd day of October 2020 at Los Angeles, California.

  
William R. Sears

*Counsel for Plaintiffs Zhu Zhai Holdings  
Limited and Peter Pui Tak Lee*

## CALIFORNIA JURAT CERTIFICATE

A Notary Public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

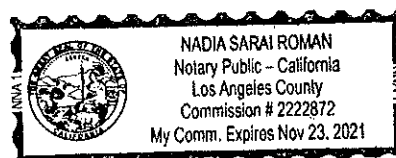
County of Los Angeles

Subscribed and sworn to (or affirmed) before me on this 02 day of October  
2020, by William R. Sears

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

WITNESS MY HAND AND OFFICIAL SEAL.

  
Signature of Notary Public



(Notary Seal)

### OPTIONAL INFORMATION

*The jurat contained within this document is in accordance with California law. Any affidavit subscribed and sworn to before a notary shall use the preceding wording or substantially similar wording pursuant to Civil Code sections 1189 and 8202. A jurat certificate cannot be affixed to a document sent by mail or otherwise delivered to a notary public, including electronic means, whereby the signer did not personally appear before the notary public, even if the signer is known by the notary public. The seal and signature cannot be affixed to a document without the correct notarial wording. As an additional option an affiant can produce an affidavit on the same document as the notarial certificate wording to eliminate the use of additional documentation.*

#### DESCRIPTION OF ATTACHED DOCUMENT

\_\_\_\_\_  
(Title of document)

Number of Pages \_\_\_\_\_ (Including jurat)

Document Date \_\_\_\_\_

\_\_\_\_\_  
(Additional Information)

#### CAPACITY CLAIMED BY THE SIGNER

- ☐ Individual  
☐ Corporate Officer  
☐ Partner  
☐ Attorney-In-Fact  
☐ Trustee  
☐ Other: \_\_\_\_\_